

# Privacy policy according to Art. 13 and 14 GDPR

# Your data is important to us!

The protection of your personal data is one of our main concerns. This is why we exclusively process your data on the basis of legal provisions (GDPR, the Austrian Telecommunications Act (TKG) 2003). The information on our privacy policy provided here is designed to acquaint you with the most important aspects of data processing for the purposes of our website.

To begin with, we are able to confirm that we only process personal data that you give us.

#### Controller



# Atoll Comfort Sailing d.o.o.

Limited Liability Company Dipl. Ing. Stefan Zainer Bračka 15 21000 Split Croatia Tel: +43 664 2032422 E-Mail: hello@comfortsailing.eu Web: www.comfortsailing.eu Personal identification number (OIB): 11002304947

#### Contacting us

If you make a (booking) request on our website or contact us via email, we store the personal data you provide for the purposes of processing your enquiry and answering any follow-up questions for a duration of six months. We do NOT pass on this data without your consent.

# Data processing, data storing and transfer of data

We process and store the following data for the purpose of processing and fulfilling the contract:

1) For the charter contract: first name, surname, address (street, postal code, city), telephone number, email address

2) For the crew list: first name, surname, place of birth, date of birth, nationality, passport number or personal identity card number

3) (optional) If you take out insurance with YACHT-POOL Versicherungs-Service GmbH: first name and surname, address (street, postal code, city) telephone number, email address, year of birth, profession, IBAN, BIC

The data you provide is necessary for the fulfilment of the contract and for taking pre-contractual measures, and in the case of the crew list, is required by mandatary law and statutory obligations. Without this data, we cannot conclude a contract with you.

Data is not transferred to third parties, with the exception of the data for the crew list, which is passed on to the competent Croatian authority due to mandatory law, or data relating to insurance if taken out (optional), which is sent to YACHT-POOL Versicherungs-Service GmbH, and the data in the charter contract, which is passed on to our accounting and tax consultants for the purposes of accounting and to enable us to fulfil our fiscal and other obligations.

When a contract is concluded (charter contract), all data from the contractual relationship is stored until the expiry of the fiscal retention period (7 years).

The data processing is based on the legal provisions of § 96 par. 3 of the Austrian Telecommunications Act (TKG) and art. 6 par. 1 lit a (Consent) and/or lit b (necessary for the fulfilment of the contract) of the GDPR.

#### Rights of the data subjects - your rights

You have the rights to access, rectification, erasure, restriction of processing, data portability, revocation and objection. If you believe that the processing of your data infringes data protection law or that your rights in relation to data protection have otherwise been infringed, you can lodge a complaint with a supervisory authority. In **Croatia**, this is the **Data Protection Authority**: Agencija za zaštitu osobnih podataka, Fra Grge Martića 14, HR - 10 000 Zagreb; tel. 00385 (0)1 4609-000; email: azop@azop.hr; web: http://www.azop.hr.

### Newsletter

When you conclude a charter contract, you have the opportunity to subscribe to our newsletter. To do so, you have to provide your email address and by marking the box in the charter contract with a cross, you confirm that you agree to receiving the newsletter.

You can cancel your subscription to the newsletter at any time. To do so, please send your cancellation request to the following email address: hello@comfortsailing.eu. We will then immediately delete your data relating to the distribution of the newsletter.